

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

BENJAMIN SASOON, and  
MARGA CELADO, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

V.

POSTMATES, INC.,

Defendant.

C.A. No. 1:17-cv-11397-JCB

**SECOND SUPPLEMENTAL MOTION FOR PRELIMINARY APPROVAL OF CLASS  
SETTLEMENT AGREEMENT, DIRECTING NOTICE TO THE CLASS, AND  
SCHEDULING FAIRNESS HEARING**

The action was brought by the Plaintiffs Benjamin Sasoon and Marga Celado (the “Plaintiffs” or “Named Plaintiffs”) on behalf of Delivery Persons, (collectively, the “Class” or “Class Members”) who made deliveries on behalf of the Defendants Postmates, Inc., (the “Defendant”) in Massachusetts. The parties have reached an agreement to settle this action on a class-wide basis for eighty-five thousand dollars (\$85,000.00). The proposed settlement is a fair result for the class and will allow the class to avoid the delay and uncertainty of further litigation.

On March 29, 2019, the Court ordered the parties to submit certain supplemental documents. The parties submit a fully executed settlement as Exhibit A and a revised class notice as Exhibit B, which now notes that individuals may opt out by email.

The Plaintiffs and Defendant respectfully request that this Court grant preliminary approval of the settlement and the proposed plan of distribution as fair, reasonable, and adequate.

and authorize the Administrator to mail and email the proposed Notice of settlement and claim form to the class.

Respectfully submitted,

BENJAMIN SASOON and MARGA CELADO

By their attorneys,

/s/

---

James D. Livingstone. BBO #640536  
John P. Regan, Esq. BBO #684326  
Employee Rights Group, LLC  
185 Devonshire Street, Suite 200  
Boston, MA 02110  
T: (857) 277-0902  
F: (857) 233-5287  
jay@maemployeeerights.com  
jregan@maemployeeerights.com

Dated: April 5, 2019.

**CERTIFICATE OF SERVICE**

I hereby certify that on April 5, 2019, I served an original and copy of the foregoing document upon counsel for Defendants via the Court's ECF system.

/s/

---

John P. Regan